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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
10 SOUTHERN DIVISION

11 September 2010 Grand Jury

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.)
15 ANGELA MOLINA,)
16 Defendant.)
17)
18)

SA CR No. **SA CR 11-0240**
I N D I C T M E N T
[18 U.S.C. § 287: False,
Fictitious, or Fraudulent Claims
Against the United States; 18
U.S.C. § 2(b): Causing an Act to
Be Done]

UNDER SEAL

19 The Grand Jury charges:

20 COUNT ONE

21 [18 U.S.C. §§ 287, 2(b)]

22 On or about May 27, 2009, in San Bernardino County, within
23 the Central District of California, and elsewhere, defendant
24 ANGELA MOLINA, a tax return preparer from Riverside, California,
25 made and presented, and caused to be made and presented, to the
26 United States Treasury Department, through the Internal Revenue
27 Service, a claim against the United States for payment of a
28 fraudulent tax refund in the amount of \$594,144 and on behalf of

1 J.I.G., with knowledge that such claim was false, fictitious, and
2 fraudulent because it was based upon a fictitious federal income
3 tax withholding in the amount of \$882,883.

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COUNT TWO

[18 U.S.C. §§ 287, 2(b)]

On or about June 1, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant ANGELA MOLINA, a tax return preparer from Riverside, California, made and presented, and caused to be made and presented, to the United States Treasury Department, through the Internal Revenue Service, a claim against the United States for payment of a fraudulent tax refund in the amount of \$1,652,676 and on behalf of F.R., with knowledge that such claim was false, fictitious, and fraudulent because it was based upon a fictitious federal income tax withholding in the amount of \$2,497,882.

